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Attorneys for Plaintiff CATHERINE BUI

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CATHERINE BUI, an individual,
Plaintiff,

vs.

ERICA L. BRACHFELD, A
PROFESSIONAL CORPORATION, a
California professional corporation;
ERICA LYNN BRACHFELD, an
individual; and DOES 1 through 10,
inclusive,
Defendants.

CASE NO.: CV08-08297 SVW (FFMx)
**NOTICE OF MOTION AND MOTION
TO COMPEL FURTHER RESPONSES
TO REQUESTS FOR PRODUCTION
AND SPECIAL INTERROGATORIES.**
**[JOINT STIPULATION AND
[PROPOSED] ORDER FILED
CONCURRENTLY]**
DATE: June 23, 2009
TIME: 10:00 am
COURTROOM: E (9th Floor Spring St.)
Discovery Cut-Off: None Set
Pretrial Conference: 7/20/09
Trial Date: 7/28/09

TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL:

PLEASE TAKE NOTICE that on June 23, 2009, at 10:00 am in courtroom 9-E of the above-entitled Court located at 312 N. Spring Street in Los Angeles, California, plaintiff CATHERINE BUI will and hereby does move the Court for an order compelling defendant ERICA L. BRACHFELD to provide further responses to Plaintiff's requests for production of documents set one, requests number 3, 4, 5, 6, 7, 13, and 15; and special interrogatories, set one, number 2, 10, and 13.

Further, Plaintiff will and hereby does request monetary sanctions against

1 defendant ERICA L. BRACHFELD at the Court's discretion under Federal Rule of
2 Civil Procedure 37(a).

3 Plaintiff's motion will be based upon this Notice, the parties' Joint Stipulation,
4 the [proposed] order, and the supplemental memorandum allowed under Local Rule
5 37-2.3.

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7 DATED: June 1, 2009

Respectfully submitted,

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9 By: /s/ Aidan W. Butler
10 Aidan W. Butler
11 Attorney for Plaintiff
12 CATHERINE BUI
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